

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JULIA ZIMMERMAN,

Plaintiff,

vs.

Case No: 23-cv-11634

Hon. Nancy G. Edmunds

Mag. Judge Anthony P. Patti

ELIZABETH A. PENSLER, D.O., PLLC d/b/a “PENSLER VEIN AND VASCULAR SURGICAL INSTITUTE” and “ELIZABETH FACE + BODY MED SPA”, a Michigan Professional Limited Liability Company, **ELIZABETH A. PENSLER, D.O.,** an Individual, **ELIZABETH MED SPA, PLLC,** A Michigan Professional Limited Liability Company, **DEREK L. HILL, D.O., PLLC d/b/a “HILL ORTHOPEDICS”,** a Domestic Professional Limited Liability Company, **DEREK L. HILL, D.O.,** an Individual, *Jointly and severally in their individual and official capacities,*

Defendants.

DEBORAH GORDON LAW

Deborah L. Gordon (P27058)

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PLAINTIFF'S INITIAL WITNESS LIST

Plaintiff Julia Zimmerman, by and through her attorneys, Deborah Gordon Law, submit the following Initial Fact Witness List.

RESERVATION OF RIGHTS

Plaintiff expressly reserves the right to supplement her Initial Fact Witness List up to and including the date the Joint Final Pretrial Order is filed. As discovery remains outstanding, Plaintiff may not presently be able to fully identify all of the witnesses she anticipates calling to testify at the time of trial. Plaintiff accordingly reserves the right to supplement this List to name any witnesses about whose knowledge or potential testimony she may become aware of during the discovery period of this action, and to rely in these proceedings on the testimony of any such witnesses.

INITIAL WITNESS LIST

1. Plaintiff Julia Zimmerman
2. Defendant Elizabeth Pensler, D.O.
3. Defendant Derek Hill, D.O.
4. Daryl Belding
5. Celina McKay
6. Amy Mesky
7. McKenna Broadus
8. Lindsay Marquadt
9. Monica Morales

10. Dan Gilbert
11. Keely Berry
12. Jenn Robertson
13. Pavlina Goodman
14. Kara Visnaw
15. Kristina Franks
16. Alejandra Caza
17. Kristina Jarret
18. Gabrielle Maciag
19. Madisen Carrier
20. Jennifer Diaz
21. Simrath Davidson
22. Rachel Pantalena
23. Sandy Jones
24. Jamie Peysakhov
25. All record keepers for Elizabeth A. Pensler, D.O., PLLC; Pensler Vein and Vascular Surgical Institute; Elizabeth Face + Body Med Spa; Elizabeth Med Spa, PLLC; Derek L. Hill, D.O., PLLC; Hill Orthopedics and any related entities.
26. Any and all witnesses identified by Defendants in their current or amended witness lists.

27. All persons referred to in any Complaint, Answer, or other pleading filed in this lawsuit but not specifically named.
28. All current and former employees of Elizabeth A. Pensler, D.O., PLLC; Pensler Vein and Vascular Surgical Institute; Elizabeth Face + Body Med Spa; Elizabeth Med Spa, PLLC; Derek L. Hill, D.O., PLLC; Hill Orthopedics or any related entities.
29. All persons or entities referred to in depositions, interrogatories, answers to interrogatories, responses to requests for documents or responses to third-party subpoenas.
30. Any and all necessary rebuttal lay and expert witnesses, including without limitation any expert witness identified by any party.
31. Any and all witnesses necessary to lay the foundation for the admission of evidence.
32. Plaintiff reserves the right to add any additional expert witnesses that may become necessary or lay witnesses as they become known through the course of additional discovery.

Dated: October 28, 2024

Respectfully submitted,

DEBORAH GORDON LAW

/s/ Elizabeth Marzotto Taylor

Elizabeth Marzotto Taylor (P82061)

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CERTIFICATE OF SERVICE

I hereby certify that on October 28 2024, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record.

/s/ Teresa D' Costa

Teresa D' Costa